

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 1:14 CV 587 (AJT/IDD)
)	
TERENCE M. HYNES and)	
KATHRYN W. HYNES,)	
)	
Defendants.)	
_____)	

DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO ANSWER

Defendants Terence M. Hynes and Kathryn W. Hynes, through Counsel, move to extend the time to answer the Complaint from July 22, 2014 until August 21, 2014 and in support thereof states that counsel was retained on July 14, 2014 and has had preliminary discussions with counsel for the United States about a potential resolution to the case. Defendants' counsel requests the additional time to research certain factual issues relevant to a possible resolution. Counsel discussed the issues with counsel for the United States who advised Defendants' counsel that he does not oppose the motion to extend time to answer by August 21, 2014.

Dated: July 17, 2014

By: /s/ James H. Rodio
James H. Rodio, PLC
Virginia Bar No. 20139
2121 Eisenhower Ave. Suite 300
Alexandria, Virginia 22314
Telephone: 703 549-2288
Fax: 703 562-7011
Email: jimrodio@rodiolaw.com

*Attorneys for Defendants, Terence M. Hynes
and Kathryn W. Hynes*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of July I electronically filed the foregoing Notice of Waiver of Hearing for Defendants' Motion to Extend Time to Answer with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Michael J. Martineau
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 227, Ben Franklin Station
Washington, D.C. 20044
(T) 202 307-6483
(F) 202 514-6866
(e) Michael.J.Martinequ@usdoj.gov

Gerard Mene
Assistant United States Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314
(T) 703 299-3777
(F) 703 299-3983
(E) Gerard.Mene@usdoj.gov

Counsel for United States of America

/s/ James H. Rodio
James H. Rodio
James H. Rodio, PLC
Virginia Bar No. 20139
2121 Eisenhower Ave. Suite 300
Alexandria, Virginia 22314
(T) 703 549-2288
(F) 703 562-7011
(E) jimrodio@rodiolaw.com

*Attorney for Terence Hynes and
Kathryn W. Hynes*